



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Blue Ridge Regional Office

www.deq.virginia.gov

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STATIONARY SOURCE PERMIT TO OPERATE

**This permit includes designated equipment subject to
National Emission Standards for Hazardous Air Pollutants for Source Categories.**

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia
Regulations for the Control and Abatement of Air Pollution,

Sam Moore Furniture LLC
1556 Dawn Drive
Bedford, Virginia 24523
Registration No.: 30072

is authorized to operate

an Upholstered Household Furniture Manufacturing facility

located at

1556 Dawn Drive, Bedford, Virginia

in accordance with the Conditions of this permit.

Approved on ??draft.

Robert J. Weld
Regional Director

Permit consists of 8 pages.
Permit Conditions 1 to 18.

INTRODUCTION

This permit approval is based on the permit application dated September 25, 2012, including amendment information dated January 3, 2013 **??others [and supplemental information dated {insert date here}]**. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-20 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List** - Equipment at this facility consists of the following:

Equipment permitted prior to the date of this permit				
Reference No.	Equipment Description	Rated Capacity	Federal Requirements	Permit Date
B002	Northfab; Waste wood-underfeed stoker (Primary) and No. 2 Fuel Oil-fired-Horizontally fired boiler.	12.6 MMBtu/hr	MACT JJJ JJJ – Area Source Boiler	10-29-2001
W004	<u>Wood Processing Operations:</u> Miscellaneous Equipment	800 board feet/hr	---	03-04-1998 & 08-30-2000
F003	<u>Finishing Operation:</u> Eight spray booths; four conventional spray guns, 76 HVLP guns, 18 airless guns and 3 ovens (heated by boiler steam).	21.1 gallons/hr	MACT JJ – Wood Furniture	10-26-2001

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Equipment installed prior to the date of this permit				
Reference No.	Equipment Description	Rated Capacity	Federal Requirements	
B001	Iron-Fireman 302-AL-A-250; Horizontally fired, No. 2 Fuel Oil-fired boiler.	9.8 MMBtu/hr	MACT JJJ JJJ – Area Source Boiler	---
B003	Cleaver Brooks CB-100-200; Horizontally fired, No. 2 Fuel Oil-fired boiler.	8.4 MMBtu/hr	MACT JJJ JJJ – Area Source Boiler	---
G006	<u>Gluing Operations:</u> Two (2) hooded glue spraying stations; HVLP spray guns.	2 gallons/hr	MACT JJ – Wood Furniture	None

Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit
(9 VAC 5-80-850)

OPERATING LIMITATIONS

2. **Fuel** - The approved fuel for the Iron-Fireman boiler (B001) and the Cleaver Brooks boiler (B003) is distillate oil. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-850)

3. **Fuel Throughput** - The Iron-Fireman boiler (B001) and the Cleaver Brooks boiler (B003) combined shall consume no more than 400,000 gallons of distillate oil per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

4. **Fuel** -.The distillate oil shall meet the specifications below:

DISTILLATE OIL which meets the ASTM D396 specification for numbers 1 or 2 fuel oil
(9 VAC 5-80-850)

5. **Fuel Certification** - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:

- a. The name of the fuel supplier;
- b. The date on which the distillate oil was received;
- c. The quantity of distillate oil delivered in the shipment;
- d. A statement that the distillate oil complies with the American Society for Testing and Materials specifications (ASTM D396) for number 2 fuel oil; and

- e. The sulfur content of the distillate oil.

Fuel sampling and analysis, independent of that used for certification, as may be periodically required or conducted by DEQ may be used to determine compliance with the fuel specifications stipulated in Condition 4. Exceedance of these specifications may be considered credible evidence of the exceedance of emission limits.
(9 VAC 5-80-850)

EMISSION LIMITS

6. **Process Emission Limits** - Emissions from the operation of the Northfab boiler (B002) shall not exceed the limits specified below:

Volatile Organic Compounds	0.21 lbs/hr	0.9 tons/yr
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These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with this emission limit may be determined as stated in Condition 11.c.
(9 VAC 5-80-850)

7. **Process Emission Limits** - Emissions from the operation of the Gluing Operations (G006) shall not exceed the limits specified below:

Volatile Organic Compounds	4.8 tons/yr
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These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with this emission limit may be determined as stated in Condition 11.d.
(9 VAC 5-80-850)

8. **Process Emission Limits** - Emissions from the operation of the Finishing Operation (F003) shall not exceed the limits specified below:

Volatile Organic Compounds	94.0 tons/yr
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These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with this emission limit may be determined as stated in Condition 11.e.
(9 VAC 5-80-850)

9. **Facility wide Emission Limits** - Total emissions from the upholstered household furniture manufacturing facility shall not exceed the limits specified below:

Volatile Organic Compounds 99.8 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition 11.f.

(9 VAC 5-80-850)

10. **Facility wide Emission Limits** - Hazardous air pollutant (HAP) emissions, as defined by §112(b) of the Clean Air Act, from the upholstered household furniture manufacturing facility shall not exceed 9.5 tons per year of any individual HAP or 24.5 tons per year of any combination, calculated monthly as the sum of each consecutive 12 month period. HAPs which are not accompanied by a specific CAS number shall be calculated as the sum of all compounds containing the named chemical when determining compliance with the individual HAP emissions limitation of 9.5 tons per year.

(9 VAC 5-80-850)

RECORDS

11. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:

- a. All fuel supplier certifications.
- b. Annual consumption of distillate oil (in 1000 gallons) by the Iron-Fireman boiler (B001) and the Cleaver Brooks boiler (B003) combined, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- c. Annual consumption of wood fuel (in tons) and distillate oil (in 1000 gallons) by the Northfab boiler (B002), calculated monthly as the sum of each consecutive 12-month period. The consecutive 12-month period sums shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- d. Monthly and annual material balance for the glues applied on G006 including the throughput, transfer efficiency, and emissions of VOC to show compliance with Condition 7. Annual throughput and emissions shall be calculated monthly as the sum of each consecutive 12 month period. The consecutive 12-month period sum shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

- e. Monthly and annual material balance for the coatings applied on F003 including the throughputs and emissions of VOC to show compliance with Condition 8. Annual throughput and emissions shall be calculated monthly as the sum of each consecutive 12 month period. The consecutive 12-month period sums shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- f. Monthly and annual emissions to verify compliance with the facility wide VOC emission limitation in Condition 9. Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period. The consecutive 12-month period sum shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- g. Monthly and annual emissions to verify compliance with the individual and total HAP emission limitations in Condition 10. Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period. The consecutive 12-month period sums shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-900)

GENERAL CONDITIONS

12. Right of Entry - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
- d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.

(9 VAC 5-170-130 and 9 VAC 5-80-850)

- 13. Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Blue Ridge Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Blue Ridge Regional Office in writing.
(9 VAC 5-20-180 C and 9 VAC 5-80-850)
- 14. Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-850)
- 15. Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown, soot blowing, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.
(9 VAC 5-50-20 E and 9 VAC 5-80-850)
- 16. Permit Suspension/Revocation** - This permit may be revoked if the permittee:
- a. Knowingly makes material misstatements in the permit application or any amendments to it;
 - b. Fails to comply with the terms or conditions of this permit;
 - c. Fails to comply with any emission standards applicable to a permitted emissions unit;
 - d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;
 - e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time that an application for this permit is submitted;
 - f. Fails to comply with the applicable provisions of Articles 6, 8 and 9 of 9 VAC 5 Chapter 80.
- (9 VAC 5-80-1010)

Signature Date: Draft??

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17. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Blue Ridge Regional Office of the change of ownership within 30 days of the transfer.

(9 VAC 5-80-940)

18. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.

(9 VAC 5-80-860 D)